

FILED
DISTRICT COURT OF GUAM

MAR -2 2006

MARY L.M. MORAN
CLERK OF COURT

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8 **IN THE UNITED STATES DISTRICT COURT**

9 **FOR THE DISTRICT OF GUAM**

10 UNITED STATES OF AMERICA,) CRIMINAL CASE NO. 05-00053
11 Plaintiff,)
12 vs.) **UNITED STATES' MOTION
13**) TO RELEASE GRAND JURY
14 CHRISTOPHER M. ESPINOSA) TRANSCRIPTS
and BRIAN WILLIAM ELM,)
15 Defendants.)
16

17 COMES NOW the United States and moves this Honorable Court for an order allowing
18 the release to defense counsels, G. Patrick Civille and Curtis Van de Veld, of the testimony of the
19 witnesses who appeared before the Grand Jury in this matter and who will testify at trial.
20 Presently, these transcripts are sealed pursuant to Federal Rules of Criminal Procedure 6(e);
21 counsel is entitled to receive them after the witnesses' testimony pursuant to 18 U.S.C. § 3500.

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ORIGINAL

1 This motion is made for the reason that release of this document prior to the testimony of
2 the witnesses will expedite the timely conduct of the trial itself.

3 ||| Respectfully submitted this 2nd day of March, 2006.

LEONARDO M. RAPADAS
United States Attorney
Districts of Guam and NMI

By:

RUSSELL C. STODDARD
First Assistant U.S. Attorney